

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

INVENSENSE, INC.

Plaintiff,

v.

STMICROELECTRONICS, INC.

Defendant

Civil Action No. 2:13-cv-405

**DECLARATION OF RINO PERUZZI IN SUPPORT OF DEFENDANT'S MOTION TO
TRANSFER**

I, Rino Peruzzi, declare as follows:

1. I am the Vice President of Sales for Global Key Accounts at STMicroelectronics, Inc. ("ST"). I have personal knowledge of the facts set forth in this Declaration, and if called upon as a witness, I could and would testify to such facts under oath. I am providing this Declaration in support of ST's Motion to Dismiss for Improper Venue Or In The Alternative to Transfer.

2. I have reviewed I have reviewed the Amended Complaint for Patent Infringement filed by InvenSense, Inc. ("InvenSense") in the above-entitled matter. The Amended Complaint for Patent Infringement filed by InvenSense identifies the LSM330DLC, LSM330, L3G4200D, and A3G425D as products accused of infringing U.S. Patent No. 8,347,717; and the LSM330 as a product accused of infringing U.S. Patent Nos. 8,351,773 and 8,250,921. The L3G4200D and A3G425D are microelectromechanical products that incorporate a gyroscope that senses rotational motion. The LSM330 and LSM330DLC are microelectromechanical products that include both a gyroscope and one or more accelerometers. These types of devices placed at issue in the Amended Complaint are referred to herein as the "MEMS Devices."

3. ST has a major regional office located at 2625 Augustine Drive, Santa Clara, California, which I am informed, is part of the United States District Court for the Northern District of California (the "Northern District of California"). I, along with my team of 14 other ST employees, work in ST's Santa Clara, California office to provide technical marketing, sales, and development support to ST's largest U.S. customer of the MEMS Devices, Apple Inc. ("Apple").

4. I am aware of at least the following STM employees, including myself, located in Santa Clara, California that work on different aspects of product marketing, sales and/or support for ST's U.S. customers who use the MEMS Devices:

STM Employees	Title
Nicole Assarian	Account Manager
Cynthia Bulat	Sales Associate III
Yun-Hao "Jassie" Chao	Product Marketing Staff Engineer
Hameed Chaudhury	Account Executive Manager
Diane Kato-Baer	Sales Support Manager
Raj Kotadia	Director of Sales
Chia-Chen Liu	Sales Associate I
Rino Peruzzi	Vice President of Major Accounts - Apple
Reid Vigdor	Account Manager
Kai Zhang	Senior Account Executive Manager

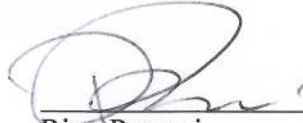
5. In addition to working with Apple, employees in Santa Clara, California provide marketing and sales support to other U.S. customers of ST, including Google, Hewlett Packard, Intel, Amazon, Microsoft, and Nike, all of whom are based on the West Coast.

6. All of the documents created and used by my team are maintained in ST's Santa Clara, California office. These documents include presentations and other marketing materials, sales and pricing information, technical specifications, and communications with customers regarding the MEMS Devices.

7. I am unaware of any ST employees that work on the design, development, marketing or sales of the MEMS Devices who are based in Texas.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed July 16, 2013, at Grenoble, France.

A handwritten signature in dark ink, appearing to read 'Rino Peruzzi', is written over a horizontal line.

Rino Peruzzi
STMicroelectronics, Inc.